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KAPLAN, J

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKIn re PARMALAT SECURITIES  
LITIGATION,

This document relates to: 07 Civ. 03790

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE  
LIFE INSURANCE COMPANY, and JOHN  
HANCOCK INSURANCE COMPANY OF  
VERMONT,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION,  
BANK OF AMERICA, N.A., and BANC OF  
AMERICA SECURITIES LLC,

Defendants.

MASTER DOCKET

04 MD 1653 (LAK)

JOINT STIPULATION AS TO  
EXPERT DISCOVERY AND  
ADDITIONAL FACT DISCOVERY

This Joint Stipulation applies only to the above-captioned action, which was consolidated in the *In Re Parmalat* MDL proceeding on May 17, 2007.

1. The purpose of this Stipulation is to establish a reasonable time period within which the parties may conduct expert discovery.
2. In a September 12, 2007 Joint Stipulation, the parties agreed to a limited extension of the fact discovery period from September 21, 2007 until October 25, 2007, for depositions only. That Joint Stipulation was endorsed by the Court on September 18, 2007.
3. As part of that Joint Stipulation, the parties agreed that prior to the conclusion of the fact discovery period they would consult with one another and thereafter make application to

the Court with respect to reasonable deadlines for the exchange of expert reports, the completion of expert discovery, and the filing of dispositive motions, if any.

4. After such consultation, the parties have agreed to the following expert schedule, pending the Court's endorsement:



- Initial Reports Exchanged: February 15, 2008
- Rebuttal Reports Exchanged: March 28, 2008
- Completion of Expert Discovery: May 16, 2008


5. With respect to dispositive motions, the parties will confer prior to the close of expert discovery and thereafter submit a proposed schedule to the Court.

6. Additionally, the parties ask that the Court extend the fact discovery period in this action solely for the purpose of allowing Bank of America to serve an additional set of interrogatories intended to cover a limited number of topics, which topics were originally part of the Bank's 30(b)(6) notice.

7. As part of an agreement to limit the scope of the Bank's 30(b)(6) deposition of John Hancock, which deposition took place on October 25, 2007 and was the subject of negotiation between the Bank and John Hancock, the parties agreed that the Bank would serve a set of additional interrogatories on selected topics upon the Court's approval. The parties have agreed to the form of those interrogatories.

November 13, 2007

By  HENRIGAN BENNETT & DORMAN LLP Lauren Smith Peter J. Most 865 South Figueroa Street, Suite 2900 Los Angeles, California 90017 (213) 694-1200  <i>Counsel for John Hancock Life Insurance Co., John Hancock Variable Life Insurance Co., and John Hancock Insurance Co. of Vermont.</i>	By  HELMS MULLISS & WICKER, PLLC Peter Covington John H. Cobb Matthew J. Hoefling 201 North Tryon Street Charlotte, North Carolina 28202 (704) 343-2196  <i>Counsel for Bank of America Corp., Bank of America, N.A., and Banc of America Securities LLC.</i>
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*No further action*  


Lewis A. Kaplan  
United States District Court Judge

11/13/07